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Of Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

**JENNIFER JOY FREYD,**

Plaintiff,

v.

**UNIVERSITY OF OREGON, MICHAEL H.  
SCHILL and HAL SADOFSKY,**

Defendants.

Case No. 6:17-cv-00448-MC

JOINT STATUS REPORT

Pursuant to this Court's July 18, 2018 Scheduling Order, counsel for the parties have conferred regarding case scheduling in this matter and hereby submit this Joint Status Report.

At the time the schedule was vacated, there was one deposition scheduled to be taken by Plaintiff, the parties had some continuing discussions related to document production and had not yet conferred on Defendants' planned dispositive motions. During conferral the parties

considered the availability of Plaintiff's lead counsel, the appearance of Plaintiff's co-counsel,

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Whitney stark, the status of discovery, and the schedule of all counsel and the respective parties.

Based on these considerations, Plaintiff and Defendants respectfully submit this Joint Status Report and ask the Court to set the following case management schedule:

1. Close of fact discovery is October 26, 2018;
2. The deadline for filing dispositive motions is November 16, 2018;
3. The deadline for filing a response to dispositive motions is December 14, 2018;
4. The deadline for filing a response to dispositive motions is January 4, 2019;
5. Joint ADR report is due February 8, 2019;
6. The deadline for expert disclosures shall be four weeks after the Court issues an order on dispositive motion(s);
7. The close of expert discovery shall be six weeks after the deadline for expert disclosures;
8. The parties propose that this Court request a joint status report proposing a trial date within 7 days of this Court's order on dispositive motion(s) or that the Court set a trial date on issuance of an order on dispositive motions.

Dated: September 18, 2018

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